

**SPEISER KRAUSE**

COUNSELLORS AT LAW

*800 Westchester Avenue*

*Suite South 608*

*Rye Brook, New York 10573*

PHONE: (914) 220-5333 FAX: (914) 220-5

WWW.SPEISERKRAUSE.COM

5555 GLENRIDGE CONNECTOR, NE  
SUITE 550  
ATLANTA, GA 30342  
T: (404) 751-0632  
F: (866) 936-6382

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DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 3/30/2023

70  
years

March 28, 2023

**VIA ECF**

Magistrate Judge Sarah Netburn  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: 03 MDL 1570, In Re Terrorist Attacks of September 11, 2001  
02 CV 6977 Ashton v. Al Qaeda, et al.,  
02CV7230 Burlingame v. Bin Laden, et al. and  
02-cv-7236 Bauer et al. v. al Qaeda Islamic Army, et al.,**

Dear Judge Netburn,

The undersigned represent plaintiffs in the above referenced consolidated actions for whom final judgments are being sought against the Taliban. Multiple motions seeking the entry of final judgments for economic and non-economic losses on behalf of certain *Ashton, Burlingame and Bauer* Plaintiffs have been filed on the Court's electronic docket in the three discreet actions referenced above, including specifically at 03-md-1570 Doc. Nos. 8274-8276 (*Ashton*), 8298-8300 (*Bauer*), 8335-8337 (*Burlingame*) and 8363-8364 and 8366 (*Burlingame II*).<sup>1</sup>

By the Report and Recommendation dated March 15, 2023, the Court recommended denying the motions filed by the non-US national plaintiffs included the above three actions, with leave to re-file, and requested the inclusion of additional information as exhibits to the renewed motions. *See* MDL Doc. No. 8929 at 5-6. While these plaintiffs do not intend to file objections under FRCP 72 to the Report and Recommendation, we write out of an abundance of caution before the expiration of the 14-day deadline applicable to the filing of objections to advise the Court that the non-US nationals intend to refile their motions for final judgments against the Taliban and, to the extent the Court intends to impose any time restriction on the refile, request that they be afforded no less than 60 additional days to refile with the additional information requested by the Court.

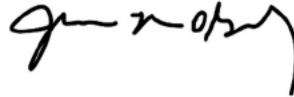
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<sup>1</sup> An additional motion seeking non-economic damages against the Taliban on behalf of certain *Burlingame* plaintiffs represented by the undersigned, including non-US nationals, remains pending at MDL Doc. Nos. 8737-8739.

SPEISER KRAUSE

Thank you and best regards.

Respectfully submitted,

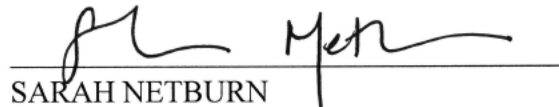


Speiser Krause, PC  
Jeanne M. O'Grady, Esq.  
800 Westchester Avenue, Suite S-608  
Rye Brook, New York 10573  
Tel: (914) 220-5333  
Counsel for the *Burlingame* Plaintiffs

Kreindler & Kreindler LLP  
Megan W. Benett, Esq.  
485 Lexington Avenue, 28<sup>th</sup> Floor  
New York, New York, 10017  
Tel: (212) 687-8181  
Counsel for the *Ashton* Plaintiffs

Baumeister & Samuels, P.C.  
Dorothea M. Capone, Esq.  
140 Broadway, 46th Floor  
New York, New York 10005  
Tel: (212) 363-1200  
Counsel for the *Bauer* Plaintiffs

The Court declines to impose any deadline for refiling motions denied in ECF No. 8973.  
**SO ORDERED.**

  
SARAH NETBURN  
United States Magistrate Judge

Dated: March 30, 2023  
New York, New York